

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

18-CR-55-LJV-MJR

JAMES CHAPMAN,

Defendant.

STIPULATION

On March 13, 2020, defendant filed a Motion to Seal (Dkt. 52) requesting that his Sentencing Memorandum and attached Exhibits A through I, be filed under seal.

On March 17, 2020, Defendant's Sentencing Memorandum and attached exhibits were filed under seal. (Dkt. 54).

On July 13, 2021, the government filed the Government's Response to Defendant's Sentencing Memorandum, inter alia, challenging the permanent sealing of defendant's memorandum. (Dkt. 75).

At sentencing held on July 14, 2021, the Court issued a briefing schedule for the parties to file additional written submissions, or alternatively, to come to an agreed upon resolution for this case.

IT IS HEREBY STIPULATED AND AGREED, for purposes of this case only and without prejudice for requests for sealing in other matters, or for the government to challenge the appropriateness of sealing in future filings, that **Exhibits B through I, should remain under**

seal, and that defendant's written Sentencing Memorandum and Exhibit A (handwritten letter from James Chapman) shall be unsealed.

Dated: Buffalo, New York, July 27, 2021



MaryBeth Covert
Senior Litigator
Federal Public Defender's Office
Western District of New York
300 Pearl Street, Suite 200
Buffalo, New York 14202
marybeth_covert@fd.org



Aaron Mango
Assistant United States Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
aaron.mango@usdoj.gov